



michael kurgan <n461bb@gmail.com>

Deposition and meet and confer on protective order

michael kurgan <n461bb@gmail.com>

Thu, Jul 20, 2017 at 11:34 AM

To: Nick Henderson <nhenderson@portlaw.com>

Bcc: "bbeskanos@aol.com" <bbeskanos@aol.com>

Mr. Henderson,

As you know my response to the court is due tomorrow on your contempt motion. You have falsely represented to the court that I have refused to have my deposition taken. Nothing could be further from the truth on two occasions you have emailed me and set dates for the deposition which I did not object to with the promise of sending me a formal notice with the details. On both occasions you failed to send out a formal notice with any details and the dates that you proposed in the email came and went.

Therefore I have never refused to sit for my deposition and am willing to have it taken on any day with proper notice via telephone. If there is another day or method please let me know and I will try to accommodate it..

You have been very diligent in sending me all notices via email and I have completely reviewed every email I received from you and have never seen a formal notice.

Furthermore I am asking you to recognize my wife's Florida constitutional rights under tenancy in the entirety. If you are unwilling to acknowledge that right then I will seek a protective order.

If you have any formal notices of the deposition please email me as soon as possible. I have attached copies of the communication from you to me in regards to setting my deposition with the promise of sending a formal notice for your review.

Lastly I will try to have responses to your written discovery completed tomorrow however no later than Monday.

Sincerely,

Michael Kurgan

----- Forwarded message -----

From: **Nick Henderson** <nhenderson@portlaw.com>

Date: Mon, Nov 30, 2015 at 6:27 PM

Subject: RE: Lance and Linda Neibauer Joint Trust v. Kurgan; conferral regarding proposed deposition

To: "n461bb@gmail.com" <n461bb@gmail.com>

Cc: Troy Sexton <tsexton@portlaw.com>, Chris Sturgeon <csturgeon@portlaw.com>

Mr. Kurgan,

I still have not heard from you. Accordingly, I am scheduling your deposition for 12/22/15 at 9:00 a.m., at Esquire Solutions, 44 West Flagler Street, Fourteenth Floor, Miami, FL 33130. A formal notice is being sent to you.

Regards,

M&B LLP

Nicholas J. Henderson

Motschenbacher & Blattner LLP

117 SW Taylor Street, Suite 300


Portland, OR 97204-3029

Direct Tel: 503-417-0508; Direct Fax: 503-417-0528

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